



March 31, 2010

Reply to Attn of: CC-A

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: National Space Club Debus Awards Dinner, April 17, 2010

The Florida Committee of the National Space Club, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host the Dr. Kurt H. Debus Awards Dinner at the Debus Center on Saturday, April 17, 2010. This annual award was created by the National Space Club Florida Committee to recognize a person who has made a particularly important contribution to U.S. aerospace efforts while working in Florida. The award is named for KSC's first Director, Dr. Kurt H. Debus. Roy Tharpe, President, Space Gateway Support, is the recipient of the 2010 Debus Award. Approximately 270 guests are expected to attend the Awards Dinner. These guests include corporate executives, aerospace contractor and other organizations, members of academia and representatives of state and Federal government. The cost for the dinner is \$75 a ticket.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in attendance at this event. The dinner will provide employees the opportunity to demonstrate NASA's support of this program which recognizes noteworthy space-related efforts in Florida. In addition, this event is a forum for employees to discuss matters of interest to NASA with a diverse group of fellow attendees interested in our activities. It is in the Government's best interest for employees to attend the dinner as representatives of NASA. Accordingly, NASA employees whose duties do not substantially affect the sponsor, including those employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge, may accept an invitation for complimentary attendance at the event.

NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from the Chief Counsel's Office.


Jerald D. Stubbs
Agency Designee

Distribution:
STD-L-A